

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

EDGARDO QUIROS MORALES
Defendant.

CRIM. NO. 97-072(SEC)

URGENT REQUEST FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW, the United States of America, through the undersigned attorneys, and before this Honorable Court very respectfully states and prays as follows:

1. On January 14, 2008, the defendant file a “Motion for Modification of Sentence” (Dkt. No. 740).

2. The undersigned Assistant United States Attorney was out of the office in official travel, at the National Advocacy Center, from the 7th to the 18th of January, 2008. As such, it was not until the 22th of January, 2008, that the undersigned arrived to the office.

3. Unfortunately, when the instant case was closed our case file was sent to the Federal Record Center, Central Plains Region, Lee’s Summit, Missouri. Therefore, the undersigned has not been able to become familiar with the facts and circumstances surrounding this case. Specifically, the undersigned does not know the terms of the Plea Agreement, Pre-Sentence Investigation Report, and other relevant documents.

4. The undersigned has requested the file in the case and will need additional time to prepare a response to defendant’s motion for modification of sentence. Therefore, the United States requests an extension of thirty days, until February 29, 2008, to file the responsive pleading.

WHEREFORE, the United States respectfully requests from the Court to take notice of the above, and to grant an extension of thirty days, until February 29, 2008, to file a response to defendant's motion for modification of sentence.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of January, 2008.

ROSA EMILIA RODRÍGUEZ-VÉLEZ
United States Attorney

s/Ilianys Rivera Miranda
Ilianys Rivera Miranda - 223006
Assistant U.S. Attorney
Torre Chardón, Room 1201
350 Carlos Chardón Avenue
San Juan, PR 00918
Tel. (787) 766-5656
Ilianys.Rivera@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system to notify the counsels of record, and to defendant Edgardo Quiros Morales, inmate # 41496-054 by priority mail at: P.O. Box 33, Terre Hante, IN 47808.

At San Juan, Puerto Rico, this 30th day of January, 2008.

s/Ilianys Rivera Miranda
Ilianys Rivera Miranda - 223006
Assistant U.S. Attorney
